

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DENISE BAKER,
*For herself and on behalf of all
similarly situated individuals,*

Plaintiff,

v.

Case No.: 1:17-cv-1160 (LMB/JFA)

NAVIENT SOLUTIONS, LLC

Defendant.

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND PAYMENT OF COSTS AND LITIGATION EXPENSES AND
FOR A CLASS REPRESENTATIVE SERVICE AWARD**

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d) and this Court's Preliminary Approval Order dated July 3, 2018, Plaintiff moves this Court for entry of an Order awarding (i) attorneys' fees in the amount \$833,333.33, being one third of the Settlement Fund; (ii) payment of costs and litigation expenses incurred by Plaintiffs' counsel in the amount of \$24,379.83; and (iii) payment of a service award to the named Plaintiff and class representative, Denise Baker, in the amount of \$15,000.00.

The grounds for this motion are set forth in Plaintiff's accompanying Memorandum in Support. A proposed order encompassing both this motion and the motion for final approval will be presented with the filing of the motion for final approval.

Date: October 31, 2018

Respectfully submitted,

DENISE BAKER

By: /s/ William L. Downing
William L. Downing

William L. Downing, VSB 17704
Attorney for Plaintiff
CONSUMER LEGAL SOLUTIONS, PC
1071 Bay Breeze Drive
Suffolk, VA 23435
Tel. 757-942-2554
Email: wdowninglaw@aol.com

Henry A. Turner (appearing *pro hac vice*)
Attorney for Plaintiff
TURNER LAW OFFICES, LLC
403 W. Ponce de Leon Ave., Suite 207
Decatur, GA 30030
Tel. 404-378-6274
Email: hturner@tloffices.com

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel of record:

Margaret Inomata, VSB No. 84007
VEDDER PRICE, PC
1401 I Street NW, Suite 1100
Washington, DC 20005
Tel. 202-312-3320
Fax 202-312-3322
minomata@vedderprice.com

Lisa M. Simonetti (appearing *pro hac vice*)
VEDDER PRICE (CA), LLP
1925 Century Park East, Suite 1900
Los Angeles, California 90067
Tel. 424-204-7700
Fax 424-204-7702
lsimonetti@vedderprice.com

Christopher Rene Ramos (appearing
pro hac vice)
Attorney for Defendant
VEDDER PRICE (CA), LLP
1925 Century Park East, Suite 1900
Los Angeles, California 90067
Tel. 424-204-7700
Fax 424-204-7702
cramos@vedderprice.com

Counsel for Defendant Navient Solutions, LLC

/s/ William L. Downing

William L. Downing, VSB No. 17704
CONSUMER LEGAL SOLUTIONS, PC
1071 Bay Breeze Drive
Suffolk, VA 23435
Tel. 757-942-2554
Fax 757-942-2554
Email: wdowninglaw@aol.com
Counsel for the Plaintiff